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Attorneys for Plaintiff
MAUREEN NOLAN

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

MAUREEN NOLAN,
Plaintiff,

vs.

PORTER MCGUIRE KIAKONA, LLP;
ASSOCIATION OF APARTMENT
OWNERS OF THE PACIFIC
ISLANDER,

Defendants.

Civil No. 23-CV-00271-DKW-WRP

PLAINTIFF MAUREEN NOLAN'S
MOTION TO COMPEL DISCOVERY
AND FOR SANCTIONS;
MEMORANDUM IN SUPPORT OF
MOTION; DECLARATION OF
BRUCE F. SHERMAN;
DECLARATION OF RICHARD L.
HOLCOMB; EXHIBITS "1" - "6";
CERTIFICATES OF COMPLIANCE;
CERTIFICATE OF SERVICE

**PLAINTIFF MAUREEN NOLAN'S MOTION TO COMPEL
DISCOVERY AND FOR SANCTIONS**

Plaintiff MAUREEN NOLAN ("Nolan") by and through her undersigned counsel, and pursuant to Rules 26, 36 and 37 of the Federal Rules of Civil Procedure (Fed. R. Civ. P), hereby moves this Court for an order compelling the Defendant Porter McGuire Kiakona, LLP ("PMK") to file substantive responses to the Plaintiff's Request for Admissions and Certificate of Service [Dkt. No. 30] filed with this Court on March 7, 2024 and for attorneys' fees and costs in bringing this motion before the Court and sanctions. Alternatively, Plaintiff requests that her First Request For Admissions to Defendant Porter McGuire & Kiakona, LLP, dated March 7, 2024 ("Request"), be deemed admitted due to the Defendant's extreme bad faith in responding to the Request.

This Motion is based on the accompanying memorandum, declaration, certificates of compliance and exhibits attached thereto. In addition to requiring

payment of reasonable expenses, including attorneys' fees and costs, caused by Defendant's failure to respond, sanctions may include any of the actions authorized under Rule 37(b)(2)(A), (B) and (C), Rule 11 of the Fed. R. Civ. P, and L.R. 37.1.

DATED: Honolulu, Hawaii, July 31, 2024.

/s/ Terrance M. Revere
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